



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

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August 13, 2019

By ECF

The Honorable Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: ***United States v. Borough of Woodcliff Lake et al.,***
Civil Action No. 2:18-cv-10511 (JLL) (JAD)

Valley Chabad Inc. v. Borough of Woodcliff Lake et al.,
Civil Action No. 2:16-cv-8087 (JLL) (JAD)

Dear Judge Dickson:

As discussed during the July 30, 2019 conference with the Court, we write on behalf of all parties to propose discovery deadlines in this consolidated matter. The parties have conferred and propose the following deadlines, applicable to both actions unless specified below. All parties consent to the following proposed deadlines:

1. Defendants' corrected production of ESI: August 14, 2019
2. Responses to outstanding written discovery requests in private action: To be determined based on the Court's decision in the pending motion to compel.
3. Defendants' production (all ESI and non-ESI) complete: August 31, 2019
4. Production of corrected privilege log: September 30, 2019
5. All fact discovery completed: January 17, 2020
6. Affirmative expert reports due: March 31, 2020
7. Responding expert reports due: May 29, 2020

8. All expert discovery completed: June 30, 2020

As in prior submissions, the parties further propose that each side be limited to twenty (20) fact witness depositions.

We thank the Court for considering these proposed deadlines.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

By: /s/ Susan Millenky
SUSAN MILLENKY
Assistant United States Attorney

cc: Henry E. Klingeman, Esq. (By ECF)
Helen A. Nau, Esq. (By ECF)
Sieglinde K. Rath, Esq. (By ECF)
Brent Robert Pohlman (By ECF)
Eric L. Harrison (By ECF)

CERTIFICATE OF SERVICE

I, Susan Millenky, Assistant United States Attorney for the District of New Jersey, hereby certify that on August 13, 2019, the foregoing letter was served on counsel for all parties by ECF.

Dated: Newark, New Jersey
 August 13, 2019

/s/ Susan Millenky
SUSAN MILLENKY
Assistant United States Attorney